

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Ciardi Ciardi & Astin
Albert A. Ciardi, III, Esquire
Daniel S. Siedman, Esquire
1905 Spruce Street,
Philadelphia, PA 19103
Telephone: 215-557-3550
Facsimile: 215-557-3551
aciardi@ciardilaw.com
dsiedman@ciardilaw.com

In re:

Daryl Fred Heller

Debtor.

Chapter 11

Case No. 25-11354

**NOTICE OF MOTION FOR AN ORDER STAYING
AND/OR SUSPENDING THE EXAMINER**

PLEASE TAKE NOTICE that on a date and time to be set by the Court in the Order Shortening Time or as soon thereafter as the movant may be heard, Deerfield Capital, LLC (“Deerfield”), by and through its counsel, Ciardi Ciardi & Astin will move before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Courtroom 4C, Camden, New Jersey 08101, pursuant to its Motion for an Order Staying and/or Suspending the Examiner (the “Motion”)

PLEASE TAKE FURTHER NOTICE the Debtor shall rely upon the Certification of Albert A. Ciardi, III in Support of its Motion submitted concurrently herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed uncontested, and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

CIARDI CIARDI & ASTIN

Dated: May 22, 2025

By: /s/ Albert A. Ciardi, III
Albert A. Ciardi, III, Esquire

Counsel to Deerfield Capital, LLC